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August 26, 2020

VIA Electronic Filing

Hon. Brenda K. Sannes, U.S. District Judge
Federal Building and U.S. Courthouse
P.O. Box 7336
Syracuse, New York 13261-7336

Re: *Jane Doe, et al. v. Howard Zucker, et al.*
Civil Case No.: 1:20-cv-840

Dear Judge Sannes:

As reflected by the Court's docket, our office and the offices of Sokoloff Stern, LLP jointly represent four of the named School District Defendants (i.e., Albany CSD, Ithaca CSD, South Huntington CSD, and Three Village CSD) and the eight school administrators employed by such Districts in the above-referenced action. The date for the Ithaca CSD to respond to the Complaint is currently September 3, 2020. The date for our three remaining clients to respond to the Complaint is currently September 21, 2020. (Dkt. No. 22).

We are in receipt of the August 25, 2020 Motion to Dismiss filed by the State of New York as well as the August 25, 2020 motion filed by Plaintiff's seeking injunctive relief. Those two submissions consist of more than 900 pages of materiel. More importantly, our School District clients are currently experiencing an unprecedented challenge in attempting to "re-open" schools for the 2020-21 school year and navigate local pandemic risks as well as state mandates which are extremely fluid. Those unique circumstances present very real challenges for our clients to marshal complete responses during the next several weeks.

Accordingly, we request that the Court schedule a conference during the week of September 13, 2020 (after my September 8, 2020 jury trial with Judge D'Agostino is concluded) to set briefing deadlines that are reasonable for the parties and efficient for the Court.

Thank you in advance for your consideration.

Respectfully,

JOHNSON & LAWS, LLC

S/ 
Gregg T. Johnson (Bar No. 506443)
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GTJ/lmg

cc: (via ECF)

All Counsel of Record